2025 consultation

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Submission to Net Zero Commission, NSW Government

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10 July 2025

Jingela bugalbeh¹

Parents for Climate (Parents for Climate) represents over 25,000 parents, grandparents and carers from across Australia. We are Australia's leading organisation for parents advocating for a safe climate. Our supporters are from across the political spectrum, across all Australian electorates, and from varied socio-economic backgrounds. We seek non-partisan responses to climate change and its impacts.

We advocate for Australian governments and businesses to take urgent action to cut Australia's carbon emissions to net zero as quickly as possible. We encourage Australia to take a leadership role on the world stage, leading by example and calling for other nations to take the necessary action to protect our children's futures.

For more information, visit www.parentsforclimate.org

This submission was prepared by volunteers Milos Karapandzic and David McEwen. It has been approved by Nic Seton, Chief Executive Officer of Parents for Climate.

Parents for Climate welcomes the opportunity to work closely with the NSW Government to improve the integrity and effectiveness of net zero policies. We would be pleased to provide further information, including insights from our supporter base and technical input from trusted experts in our network. We are eager to contribute constructively to the development of practical, fair, and trustworthy reforms that benefit consumers, businesses, and the climate. We believe there is strong common ground to build a system that supports the strongest educational and wellbeing outcomes while signalling clear ethical guidelines for industries that cause significant harm to our youngest Australians.

Nic Seton - CEO

¹ 'Hello and thank you' in Bundjalung

Summary of Recommendations

Engage Communities: Partner with trusted local organisations, from national, such as Parents for Climate, to hyper-local such as community electrification groups, to share information, build resilience, and drive behaviour change. Resilient communities are key to adaptation, mitigation and the transition to net zero.

End Native Forest Logging & New Fossil Fuel Projects: NSW native forests are vital carbon sinks and biodiversity hubs. Logging must stop. Coal mining accounts for over 11% of state emissions but delivers less than 1% of jobs. All new and expanded fossil fuel approvals should end.

Fix the Safeguard Mechanism (SGM): Cap and reduce emissions more aggressively, limit offset use, and mandate on-site abatement. Increase transparency via satellite monitoring and improved public reporting.

Accelerate Electrification: Ban new gas connections, phase out gas appliances, and prioritise social and rental housing for upgrades.

Improve Equity: Support low-income families through targeted finance (e.g. on-bill repayment schemes) and one-stop-shop services.

Shift Transport Culture: Promote active and public transport via congestion charges and better infrastructure. Support EV uptake through public education, combat misinformation, and avoid disjointed policies like state-based road user charges.

Equip all NSW schools and childcare centres with solar and battery systems to reduce emissions (mitigation) and ensure safe, reliable cooling and backup power during extreme weather (adaptation), protecting children's health, minimising closures, and supporting community and workforce resilience.

Waste: Cut waste and change behaviours through education, regulation, and community engagement.

Refrigerants: Mandate low-GWP refrigerants in all new developments.

Adaptation & Monitoring: Use citizen assemblies, track school closures due to extreme weather events, and adopt comprehensive emissions monitoring (Scopes 1–3). Align with Australian Sustainability Reporting Standards and recognise land and ocean ecosystems as key carbon sinks.

Parents for Climate urges the Commission to place communities - especially families - at the heart of NSW government's work, recognising the central role they play in demanding and delivering solutions. A safer, fairer, climate-resilient NSW depends on urgent, inclusive action now.

| Impact | |
|-------------------------------------|---|
| Question 1 | What can you tell us about your experience of the impacts of climate change and how can the commission seek to reflect and respond to this in its work? |
| Parents for Climate answer | Parents for Climate is Australia's leading climate advocacy organisation for parents, carers, families and all who care about a safe future for kids. With over 25,000 supporters, and local groups in every state and territory (5607 in NSW), we represent families from across the political spectrum, in every Australian electorate, and from diverse socio-economic backgrounds. |
| | The diversity of our members have directly experienced almost all of the effects of the climate and ecological crisis unfolding now - floods, droughts, heatwaves, storms, deforestation and dying seas, to name but a few. We are teachers, doctors, farmers, nurses, musicians, business owners and plenty more besides, from all walks of life, but we all have a similar goal. We want to protect what we love. Our love for our children, who will be most adversely impacted, drives us to act. |
| Engage | ement and Change |
| Question 2 | What actions can the commission take to engage across the community to help drive the shifts needed for the net zero transition and for effective climate change mitigation and adaptation? |
| Parents for Climate | Parents for Climate believes that healthy, resilient communities are one of the best ways to drive the transition to net zero, manage the difficult trade-offs, and cope with the immense and unpredictable impacts of climate change. |
| answei | We urge you to engage directly with communities and workers that are affected by the transition to a net-zero emissions economy and the implementation of adaptation measures, to ensure a just and equitable transition. In most cases they're not to blame for their industry's myopic focus on business as usual, or for governments' abject failure to move away from emissions intensive energy and other activities in a more timely manner. |
| | We suggest that the Commission engage directly with non-profit, community-based organisations, such as Parents for Climate, from hyper-local to national. There are hundreds of such organisations in NSW and they focus on a variety of causes. We can help with understanding community needs, disseminating and collecting information to inform and support the work of the Commission. |
| | In the Climate of the Nation 2024 report ² , the Australia Institute has found that 49% of NSW residents are feeling the impacts of extreme weather events, 77% |

² Climate of the Nation 2024 report - The Australia Institute

| are most concerned about climate change bleaching the Great Barrier Reef, and fully 82% are most concerned about more droughts and flooding affecting crop production and food supply and prices, the highest of any state. This could be alleviated, at least in part, by the government providing or supporting community education and public service advertising putting prominence on truthful, science based information about the anthropogenic causes, impacts (including poor health outcomes from current fossil fuel use) and solutions to global warming and climate change. |
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| We believe NSW should consider establishing a Civilian Climate Corps, building on the idea originating in the United States ³ , organising tens of thousands of citizens to 'conserve land and water, bolster community resilience, advance environmental justice and tackle the climate crisis'. If organised and funded appropriately, it would create jobs and offer new career pathways as well. |
| In a similar vein, in the past five years, dozens of community electrification groups have been formed. These groups are often hyper-local and enjoy high trust by the residents in their communities, often considerably higher than information coming from state government ⁴⁵ . Such groups have demonstrated success at helping households reduce their dependence on fossil fuels, but rely almost exclusively on volunteers. Quite a number of our members are also involved with such groups. |
| Parents and carers are the engine room of the Australian economy through the purchasing decisions we make for our families. We also have unique networking abilities because we interact with other parents at the school gate and at sporting and cultural activities. With a little more coordination and support, more could be harnessed as, for example, "electrification evangelists". |
| Key obstacles to electrification include householders not knowing what to do or where to start, not knowing who to trust (in terms of advice from trades people), and not being able to afford to make changes due to high upfront costs. Coupled with innovative financing mechanisms such as Environmental Upgrade Agreements or repayments tied to energy bill savings, etc., parents and other trusted community groups could help turbo charge electrification retrofits. See also our response to question 20. |
| Lastly, to promote community participation, we suggest the use of citizen assemblies. Consisting of a representative number of citizens selected at random, assemblies are typically given time to delve and deliberate in depth on a complex, difficult topic and make recommendations. They have been proven many times over as effective. |
| For example, the Irish Citizens' Assembly was established in 2016 by a parliamentary resolution ⁶ and tasked 99 ordinary people with deliberating on a number of issues, including the Eighth Amendment which criminalised abortion. Based on the Assembly's recommendation, a referendum on abortion was called and in 2018, the Eighth Amendment was repealed. The Irish Citizens' Assembly |

 ³ White House launches American Climate Corps - NBC News
 ⁴ Where Australians Place Their Trust - MCCRINDLE
 ⁵ Edelman Trust Barometer 2025 - Edelman Trust Institute
 ⁶The Irish Citizens' Assembly

| | helped break decades of bitter debates and political deadlock ⁷ . Similar examples can be found in France (climate policy ⁸⁹), Canada (electoral reform ¹⁰¹¹ , impact of digital technologies on society ¹²) and the UK (how to meet the country's net zero target ¹³). | |
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| Emissi | Emissions Reductions | |
| Question 5 | What additional information and evidence should the commission consider when assessing progress towards NSW's targets for reducing net greenhouse gas emissions? | |
| Parents for Climate answer | As parents we understand the importance of natural environments for the health and wellbeing of our families. Yet a full 54%, or 29 million hectares of the forests and woodlands that once existed in NSW have been destroyed since 1750 ¹⁴ . A study by academics from the School of Environment and Society, ANU, has found further evidence of impacts of native forest logging on species that have already suffered enormous loss ¹⁵ . | |
| | Native forests are essential for carbon sequestration, biodiversity and the cultural wellbeing of First Nations and local communities. Many countries have now banned native forest logging. In Australia, South Australia has protected native forests since the 1870s. The ACT banned logging in the 1980s. As of 2024, Western Australia and Victoria have ended their native forest logging operations (except logging for fire breaks, salvage logging after windstorms, and logging on private land) ¹⁶ . Yet despite this, NSW still logs native forests. This must stop. | |
| | We also note that, according to the Clean Energy Regulator's 2023-24 Safeguard Mechanism ¹⁷ (SGM) data, 12.9 million tonnes of greenhouse emissions (only direct, Scope 1 emissions) were produced from 26 coal mines in the state that met the SGM reporting threshold. The latest NSW emissions data (disappointingly only available to 2021-22, which were 111 million tonnes ¹⁸) shows that NSW coal mine emissions (excluding combustion of the coal or associated activities such as transportation) produce 11.6% of the State's total emissions. | |
| | Given NSW only derived 3.2% of total government revenue from coal royalties | |

⁷ The Irish Abortion Referendum: How a Citizens' Assembly Helped to Break Years of Political Deadlock - Electoral Reform, UK

⁸ France's president gave ordinary people the power to formulate national climate policies. He got more than he bargained for - ABC

⁹ Convention Citoyenne pour Le Climat

¹⁰ National Citizens' Assembly on Electoral Reform

¹¹ Citizens Assemblies,: Pioneered in BC (British Columbia) 20 years ago, they're a growing pro-democracy tool - The Conversation

¹² Examining the impact of digital technologies on Canadian society - Canada Commission

¹³ The Path to Net Zero - Climate Assembly UK

¹⁴ The impacts of contemporary logging after 250 years of deforestation and degradation on forest-dependent threatened species - BioRxiV

¹⁵ Shifting baselines clarify the impact of contemporary logging on forest-dependent threatened species - Society for Conservation Biology

¹⁶ More than Half of NSW's Forests and Woodlands are Gone - The Conversation

 ¹⁷ 2023–24 baselines and emissions data - Clean Energy Regulator
 ¹⁸ Greenhouse Gas Emissions - NSW - OnlyFacts.io

| | (2019-20 data ¹⁹), and the sector employs only 25,500 ²⁰ people out of a State workforce of 4.14 million ²¹ , a paltry 0.6%, the sector makes an outrageously outsized contribution to the State's emissions. We advocate for an end to approvals of new and expanded fossil fuel extraction, and this outsized mining emissions footprint is one of the reasons why. (Nationally, gas extraction is even worse, and you can read more in our recent explainer here). |
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| | approvals imply production for decades to come ²³ , and c) a growing share of future approved production is not explicitly contracted ²⁴ by export partners. As such, it would be very possible to impose such a moratorium without adversely affecting down-stream industries, <i>or</i> local jobs in the short and medium term. |
| Transp | ort |
| Question 9 | What are likely to prove the most effective approaches to accelerate rapid decarbonisation across freight and passenger transport? |
| Parents for Climate answer | Parents for Climate advocates for a change of culture in passenger transport, a move away from reliance on cars and towards public and active transport. |
| | Congestion charging, as has been shown in a number of cases including Stockholm and London, is one of the most effective ways to rapidly reduce pollution and noise ²⁵ , as well as improve health outcomes ²⁶²⁷ . This should then be followed by making cities walkable and cycleable, with public transport ubiquitous and easy. |
| | Policies and budgets ²⁸ should clearly prioritise active & public transport in accordance with this mobility pyramid: |

¹⁹ On the way out: Government revenues from fossil fuels in Australia - AARES

²⁰ NSW coal jobs hit new record high – 25,500: Export volumes also up

²¹ Labour Market Brief - Flinders University

²² NSW losing out on billions in mining royalties that could fund coal transition - ABC

²³ Submission to the Joint Standing Committee On Net Zero Future re. the Net Zero Commission's ²¹² Australian coal exports face numerous downside risks, new projections show - IEEFA
 ²⁴ Australian coal exports face numerous downside risks, new projections show - IEEFA
 ²⁵ Why It's Time for Congestion Charging - The Grattan Institute
 ²⁶ Health Effects of Low Emission and Congestion Charging Zones - The Lancet
 ²⁷ Health Benefits of Congestion Pricing - NBER
 ²⁸ Three Sustainable Transport Wins For Australian States And Territories - The Climate Council



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| Parents | In a landmark greenwashing legal case brought by Parents for Climate, |
| for | EnergyAustralia has publicly acknowledged that offsets do not undo the harms of |
| Climate | burning fossil fuels and apologised to more than 400,000 customers of its 'Go |

²⁹ A fair and sustainable road user charge - NSW Government

³⁰ Electric cars depreciate twice as fast as petrol, according to new data - Drive

| answer | Neutral' carbon offsetting product ³¹ . As part of the settlement, EnergyAustralia – Australia's third largest domestic polluter and currently the largest participant in the government's Climate Active carbon neutral certification scheme – has publicly acknowledged that "Offsets do not prevent or undo the harms caused by burning fossil fuels" and "carbon offsets should not be used to delay or diminish the important work that needs to be done to actively decarbonise." This adds to the growing evidence that offsets simply cannot replace genuine emissions reduction; they were never intended to be more than a temporary solution for hard-to-abate industries. |
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| | And yet the Safeguard Mechanism (SGM) allows high emitting facilities, particularly fossil fuel mining/drilling and processing facilities, unlimited use of carbon credits (including ACCUs) as "offsets" to achieve the modest mandated emissions cuts on their domestic emissions. This sits in stark contrast with other similar schemes around the world, for example the EU's European Union's Emissions Trading System (ETS) which operates with "cross-crediting within the scheme only," meaning that emissions reductions generated within the EU ETS can only be used for compliance and traded within the same system (i.e. not with outside voluntary markets) and with a cap on total emissions. |
| | You can read our review of the SGM reforms in our submission to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) ³² . |
| | We urge you to consider recommendations of the Productivity Commission in their 5-year Productivity Inquiry: Managing the climate transition, Inquiry report – volume 6 ³³ , to improve the SGM including moving from emissions intensity baselines to absolute emissions baselines, lowering facility thresholds (from 100 000 tonnes to 25 000 tonnes of CO2-e per annum) and expanding sector coverage for electricity and transport. We believe this will substantially improve the coverage and ensure a much faster transition. |
| | Please also refer to our response to question 5 relating to coal mine emissions. |
| Waste | |
| Question 15 | What short to medium term measures could be prioritised to address the systemic challenges regarding waste generation and resource recovery? |
| Parents for Climate answer | We believe in the short to medium term, NSW should prioritise measures where consumer behaviour, with the right education, promotion, encouragement and regulation, can be changed. This includes promoting reuse and repair, reducing the use of single-use plastics, and reducing food waste. If done through community engagement and education, such as community repair workshops, these measures will have the added benefit of bringing people together and creating more resilient communities. |
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 ³¹ Landmark 'Greenwashing' Legal Case - Parents for Climate
 ³² Statement on Safeguard Mechanism - Parents for Climate (formerly Australian Parents for Climate Action)
 ³³ 5-year Productivity Inquiry: Managing the climate transition - Australian Productivity Commission

| | state-based legislation/regulation and lobby the federal government to improve relevant Commonwealth legislation/regulation to limit packaging and food waste. As parents, we were amused but alarmed by the series of viral videos known as "the guy who decides packaging ³⁴ " released by former ABC Giggle and Hoot star Jimmy Rees. The series exposes the inanities of consumer product packaging and contains salutary lessons for policy makers. |
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| | Meanwhile, Craig Reucassel's War on Waste also exposed the food-waste travesty of cosmetic food standards ³⁵ . State and federal governments could do much more to educate households about this folly, while limiting the supermarket chains' ability to reject perfectly edible but imperfectly formed fruits and vegetables. |
| Resou | rces |
| Question 16 | How could transparency of how coal mines meet their Safeguard Mechanism obligations be improved? |
| Parents for | We have discussed the frankly outrageous level of coal mine Scope 1 emissions (i.e. <i>before</i> the fuel is burnt) in question 5. |
| Climate answer | The main improvement to transparency would be to require coal mines to publish actual production figures so that the relationship between intensity and actual emissions can be clearly evidenced. |
| | To improve monitoring and reporting, in particular of fugitive emissions of methane, rather than relying on self-reported data or estimates based on coefficients, NSW should use direct satellite measurements. These are increasingly in use around the world, and in Australia, one such analysis has identified 40% more methane from Australian coal mines than officially reported, with fugitive emissions in NSW twice as high as official reporting ³⁶ . |
| | Furthermore, empowering the NSW EPA with an enhanced advisory role, as well as publishing detailed, comprehensive reports on the Safeguard Mechanism's performance, including data on emissions reductions, offset use, and compliance would further improve transparency and provide reassurance that the SGM is effective. |
| Question 17: | What measures would lead to coal mines prioritising on-site abatement over offsetting? |
| Parents for Climate answer | We believe strengthening regulation and discouraging reliance on offsets are both necessary. This includes stricter emissions limits, mandatory on-site abatement thresholds to qualify to offset emissions, a low, hard limit on the use of offsets as a proportion of total emissions and an absolute commitment to only the verifiable, high quality offset schemes. |
| | Coal mine operators must be held accountable and required to carry the burden - |

 ³⁴ <u>The Guy Who Decides Packaging - Jimmy Rees on YouTube</u>
 ³⁵ <u>War on Waste: Supermarket Product Specifications - ABC</u>
 ³⁶ <u>Satellite analysis identifies 40% more methane from Australian coal mines - Ember Energy</u>

| | financial or otherwise - of the rehabilitation of mine and well sites after their use-by date. Developers of current mine sites and proponents of any new sites must be obliged by the NSW government to set aside allowances for the full expected costs of rehabilitation, including adjustments for expected inflation over the life of the project. |
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| | An analysis by the Australia Institute found that (as of 2021) "filling in the Upper Hunter's final voids would cost between \$12 billion and \$25 billion, while the NSW Government holds just \$3.3 billion in environmental bonds for all mines in the state" ³⁷ . This is clearly unsustainable and unfair; we cannot expect the taxpayer to suffer the catastrophic consequences of coal pollution and then shoulder the cost of rehabilitation, in the midst of a cost of living crisis, while coal royalties contribute an average of just 2.4% ³⁸ to the NSW budget and coal companies reap enormous profits (just under \$60 billion coal exported by NSW coal companies in 2022-23 alone). |
| | The NSW Government could make the offer of assistance with rehabilitation only to coal companies which have clearly and demonstrably focused on direct emissions reductions rather than offsets. |
| Question 18 | What measures should be considered beyond the Safeguard Mechanism to reduce emissions of the resources sector, particularly methane emissions, to meet NSW's emissions reduction targets? |
| Parents for Climate answer | NSW state regulation should make it clear that there is simply no substitute for the direct reduction of emissions, such as transitioning mining operations to electricity powered by renewable sources. In addition to direct satellite measurements (see our answer to question 16 above), the resource sector should be required and/or incentivised to put in place meticulous detection and repair measures for leakage and fugitive emissions in all operations. |
| Built E | wironment |

∣ םעוונ ⊏nvironment

| Question 19 | What additional measures could accelerate electrification and increase energy efficiency of new and existing buildings? |
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| Parents for Climate answer | As a constituency group representing a broad spectrum of Australian families, including homeowners, renters, and low income families, we strongly endorse policies to accelerate residential electrification. Nationally, we would like to see an immediate end to new gas connections and a planned phase out of the gas networks serving our cities and towns, including a sunset date for the sale of new gas appliances. |
| | Residential electrification is an "easy to abate" sector, as the technologies are proven and available at scale. Electrification provides an amazing economic opportunity to develop a substantial installation and manufacturing workforce, which could potentially include export potential. We would encourage the Commission to consider the cost of not accelerating electrification, alongside every other emissions reduction opportunity, with extreme urgency. The cost of |

 ³⁷ <u>Mind the Gaps - The Australia Institute</u>
 ³⁸ <u>Coal Royalties in NSW - The Australia Institute</u>

| | negative climate impacts will dwarf any costs associated with emissions reduction policies within our or our children's lifetimes. |
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| | Parents for Climate conducted a survey to collect data about the public's experiences with home electrification, and to understand what policies they'd like to see federal politicians implement to ensure that all Australian families can access and benefit from electrification. Key insights include: |
| | Australian families are keen to electrify their homes. The most common motivations reported by families were to reduce emissions from fossil fuels, increase household energy efficiency and save money. Over a third of households who responded to our survey are currently taking steps to electrify their home. Other households are waiting until they can afford it or until existing appliances break. Households who have already electrified their homes reported benefits including reduced cost of living, more reliable appliances, increased energy independence and better health outcomes. Australian families support policy measures that will encourage electrification, including government incentives, minimum energy efficiency standards, targets for the replacement of gas in homes, and support for renters to access electrification. |
| | For detailed insight into the opinions of householders on electrification (over 400 responses) and our analysis of opportunities, barriers and our policy recommendations, please see our submission to the Senate inquiry on electrification (Oct 2023) <u>here</u> . |
| Question 20 | How could social equity be better addressed in the transition to an electrified built environment? |
| Parents for Climate answer | Parents for Climate advocates strongly that the transition to an electrified built environment is firstly directed at social and public housing. This would not just be beneficial in reducing pollution and climate harm but in supporting the most vulnerable families with lower energy costs. |
| | We would like to see minimum standards set for rental properties, ensuring they are not just safe and habitable but minimise harm to the environment and the climate. These should include proper insulation and high standard of energy efficiency, electrical appliances throughout and heat pumps for air-conditioning and hot water systems, with gas systematically phased out as soon as possible. |
| | To make energy-efficient home upgrades financially accessible for low-income owner-occupiers, finance structures should combine low-interest loans (targeted at energy-efficient upgrades for low-income families) with government subsidies and on-bill financing, ensuring that energy bill savings directly offset loan repayments. This approach minimises upfront costs and allows households to benefit from reduced energy bills while repaying the loan. |
| | Examples of successful programs include Power and Light Cooperative's (OPALCO) Switch It Up! ³⁹ (on-bill financing for energy efficiency and renewable energy upgrades), Hawaii Green Energy Money Saver (GEM\$) ⁴⁰ (also on-bill |

 ³⁹ <u>Switch It Up! - OPALCO</u>
 ⁴⁰ <u>Hawaii Green Energy Money Saver (GEM\$) - Hawaii Infrastructure Authority</u>

| | financing) and the Energy Ahead program in Western Australia ⁴¹ (helps households improve energy efficiency and replace old appliances). |
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| | Providing one-stop-shop services for households to receive help with electrification is an excellent way to speed up the transition. A good example of this is Ireland's Sustainable Energy Authority (SEAI) ⁴² , an \$8bn ⁴³ Euro program for retrofitting 500,000 homes and installing 400,000 heat pumps by the end of 2030. They offer a service for households to receive help and support end to end, from a free consultation and inspection to hands-on delivery and engagement with contractors, finance and government. Another example is the Victorian government, which announced in May 2025 ⁴⁴ that their State Electricity Commission (SEC) will set up a one-stop-shop 'free service that offers tailored plans for households to cut their energy bills with energy efficient electric appliances'. |
| | Lastly, we urge you to establish collaborative programs with community grassroots electrification groups, and provide them with extensive financial, tax and policy incentives. We also recommend you collaborate with Rewiring Australia and through their Electric Communities Network ⁴⁵ engage with and provide to 'community groups are the trusted, independent and local voices required to help households and communities understand the benefits of electrification and support them to electrify faster and more effectively'. |
| Refrige | erants |
| Question 21 | What approaches could NSW consider to eliminate refrigerants with a GWP >10 from buildings? |
| Parents for Climate answer | Parents for Climate advocates for NSW government to mandate the use of refrigerants with a GWP below 10 for all new air conditioning and refrigeration equipment in development applications, similar to the approach supporting the use of natural refrigerants adopted by the City of Parramatta ⁴⁶ . |
| Monitoring Framework | |
| Question 22 | What should be included in a monitoring framework for NSW in the context of the transition to net zero, including any specific metrics and indicators? |
| Parents for Climate answer | A monitoring framework for the transition to net zero should include emissions across all relevant scopes: Scope 1/direct, Scope 2/indirect, and Scope 3/value chain. |

Whilst emissions reductions are absolutely central to climate change mitigation

 ⁴¹ Energy Ahead - Government of Western Australia
 ⁴² Ireland's Sustainable Energy Authority (SEAI)
 ⁴³ It takes a village to build a nation's energy efficiency and electrification program - Switched On
 ⁴⁴ SEC One-Stop-Shop will Help You Slash Energy Bills - Victoria State Government
 ⁴⁵ Electric Communities - Rewiring Australia
 ⁴⁶ Natural Refrigerants in Air Conditioning Systems - City of Parramatta

adaptation, in the context of net zero carbon sequestration is the flip side of the coin. And yet it does not appear to feature very prominently in either your workplan or the first annual report (2024). We urge you to consider both land-based solutions, such as banning native forest logging (see above), but also marine environments, and the crucial role of marine sanctuaries. By protecting and restoring marine ecosystems like mangroves, seagrass beds, and coral reefs, the sanctuaries not only enhance the resilience of marine life and promote biodiversity, act as carbon sinks significantly reducing greenhouse gas emissions but also support industries like tourism and fishing⁴⁷.

The Commission should consider for its monitoring the Australian Sustainability Reporting Standards (ASRS), a set of mandatory financial reporting requirements for certain Australian entities, focusing on climate-related financial disclosures and aligned with equivalent international standards. The standards cover governance, strategy, risk management, and metrics & targets related to climate-related risks and opportunities, and are currently going through a staged implementation, with the third and final group of entities due to start reporting on 1st July 2027. Crucially, under the standards Scope 1 and 2 emissions must be disclosed from year one, with Scope 3 emissions disclosure required from year two onwards.

| Question 23 | The adaptation objective is for NSW to be more resilient to a changing climate. The Act allows for regulations to further define the adaptation objective. What does a more resilient NSW look like to you? |
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| Parents for Climate answer | Given the failure to date of global efforts to reduce emissions to date, effective climate adaptation is critical to the safety and prosperity of all Australians. As parents we understand the importance of stability for families. We want certainty that we can confidently invest in housing for our families in areas that are a) not going to be heavily impacted by physical climate risks; and b) where communities are not going to be adversely impacted by transition risks. |
| | A more resilient NSW is one where our public infrastructure actively protects the health and wellbeing of communities — especially our most vulnerable — in the face of worsening climate extremes. Nowhere is this more urgent than in the places where our children learn and grow. As extreme heat becomes more frequent and dangerous, ensuring that every school and early learning centre has access to efficient, reliable cooling must be a core part of the state's adaptation strategy. |
| | Installing solar panels with battery storage in schools and childcare centres is a practical, shovel-ready solution. It reduces reliance on the grid, enables efficient climate control during heatwaves, and protects against blackouts. For younger children — who are particularly susceptible to heat-related illness — this isn't a luxury; it's a health and safety necessity. These facilities can also serve as local resilience hubs during extreme weather events, supporting community welfare, communications and coordination. Embedding this kind of adaptation in public infrastructure is essential for a truly resilient NSW — one that safeguards children and strengthens community capacity at the same time. |

Whole of Economy Actions - Adaptation

⁴⁷ The Benefits of Marine Protected Areas - DCCEEW

| | For an in-depth explanation of our position on adaptation please refer to the Parents for Climate submission to DCCEEW on the National Adaptation Plan <u>here</u> . | |
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| Whole of Economy Actions - Climate Change Projections | | |
| Question 26 | What other information or tools are needed to support decision-makers in NSW? | |
| Parents for Climate answer | We urge you to listen to the actuaries, the risk management experts of the insurance and banking industry. In a January 2025 report by the Institute and Faculty of Actuaries of the University of Exeter ⁴⁸ , the key finding is that 'without immediate policy action to change course, catastrophic or extreme impacts are eminently plausible, which could threaten future prosperity'. The principal cause of this is that existing risk management practices for policymakers are inadequate, in that they do not properly take into account the climate extremes which are becoming more frequent: | |
| | "Climate change risk assessment methodologies understate economic impact, as they often exclude many of the most severe risks that are expected and do not recognise there is a risk of ruin. They are precisely wrong, rather than being roughly right." | |
| | and | |
| | "Traditional risk management techniques typically focus on single risks in isolation, missing network effects and interconnections, underestimating cascading, compounding risks." | |
| | We urge you to accept their suggestions to build policymaker capacity on systemic risk management, by enhancing their understanding of ecological interdependencies, tipping points and systemic risks. | |
| Whole of Economy Actions - Preparation and Responses to Extreme Heat Events | | |
| Question 27 | What initiatives should the commission consider in assessing NSW's preparation and responses to extreme heat and humidity events in NSW? | |
| Parents for Climate answer | As yet another extreme weather event ⁴⁹ threatens lives and livelihoods in NSW, we have become concerned about school closures. Parents for Climate has begun collecting data about school and childcare closures due to extreme weather and the initial numbers are staggering, if not entirely surprising. Using ACECQA data in 2024, there were 1127 days of childcare closures in NSW, primarily due to floods (1087) but also bushfires (5), cyclones (6) and health emergencies (29). There | |

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 ⁴⁸ <u>Planetary Solvency - Finding Our Balance with Nature - Institute and Faculty of Actuaries of the University of Exeter</u>
 ⁴⁹ <u>Rains, winds to strengthen as severe weather system hovers off NSW coastline - ABC</u>

were a further 99 days of public school closures. The impact on our children of missing out on care and education could be profound. We would like to see this data collected systematically, to be able to track and measure the impacts and provide support and guidance to schools to build their resilience to similar future events.

In addition to the impact on children, widespread closures of childcare centres and schools due to extreme heat or other climate-related events carry significant productivity and economic costs. When education and care services are forced to close or operate unsafely, parents — particularly mothers — are often required to take unplanned leave or reduce work hours, affecting household income and business continuity. This has ripple effects across entire communities and sectors. Many of these closures could be avoided through targeted investment in localised resilience infrastructure — such as electrification upgrades and the installation of solar and battery systems — which would enable facilities to remain safely open during heatwaves and power outages. Ensuring reliable cooling and energy supply at schools and early learning centres is not just a matter of protecting health — it is a practical and cost-effective way to safeguard social and economic resilience across NSW.

More generally, we urge you to encourage, strengthen and help build resilient communities that can organise to mitigate, adapt to and withstand extreme weather events. This can be done through education programs and workshops, in person and online, as well as community-led projects to prepare for the worst outcomes. The Commission should further encourage the government to partner with community organisations and networks, as well as local businesses, to foster community connections, improve preparedness for extreme events and protect vulnerable community members.